

## REMARKS

### 1. Introduction

In the Office Action mailed January 25, 2010, the Examiner rejected claims 1, 3, 4, 6-9, and 20 under 35 U.S.C. § 103(a) as being unpatentable over Karaoguz et al., U.S. Pub. No. 2002/0059434 (“Karaoguz”) in view of Lu et al., U.S. Patent No. 6,694,134 (“Lu”) and Forte, U.S. Patent No. 7,162,020 (“Forte”), and further in view of Bridgelall, U.S. Patent No. 7,039,027 (“Bridgelall”). The Examiner rejected claims 10 and 11 under 35 U.S.C. § 103(a) as being unpatentable over Karaoguz in view of Lu and Forte, and further in view of Thornton et al., U.S. Pub. No. 2002/0101860 (“Thornton”).

In this Response, Applicants have amended claim 1 to provide greater clarity.

For the reasons set forth below, Applicants request reconsideration and allowance of all pending claims.

### 2. Response to the Claim Rejections

The Examiner has rejected claim 1 under § 103(a) as being unpatentable over Karaoguz in view of Lu and Forte, and further in view of Bridgelall. Applicants have amended claim 1 to provide greater clarity. Applicants submit that the rejection of claim 1 should be withdrawn because (a) Forte does not teach a second data register that is co-located with a PBX and configured to transmit at least one mobility management message to a first data register in a WWAN and (b) Bridgelall does not teach at least one mobility management message that facilitates roaming between first and second wireless coverage areas by a multi-mode mobile station. These two points are discussed below.

- a. **Forte does not teach a second data register that is co-located with a PBX and configured to transmit at least one mobility management message to a first data register in a WWAN**

Amended claim 1 recites, *inter alia*, “a second data register co-located with said PBX and communicatively coupled to said first data register … said second data register being configured to transmit at least one mobility management message to said first data register.” The Examiner has admitted that the combination of Karaoguz and Lu fails to teach “a second data register co-located with said PBX and communicatively coupled to said first data register … said second data register being able to transmit at least one mobility management message to said first data register.” *See* Office Action, pp. 3-4. Instead, the Examiner has relied on Forte for this element, specifically citing to col. 11, lines 51-55 and col. 12, lines 6-22. *See* Office Action, p. 4. But Forte also does not teach the “second data register” recited in claim 1.

Col. 11, lines 51-55 refers to an embodiment in which wireless connect units (WC 30 and WC 230) are co-located with a PBX 14. Thus, in the Examiner’s rationale, Forte’s wireless connect unit (WC) corresponds to the “second data register” recited in claim 1. However, nothing in this section suggests that WC 30 or WC 230 would be configured to transmit a mobility management message to a first data register in a WWAN. Thus, Forte’s disclosure of WC 30 and WC 230 does not show a “second data register being configured to transmit at least one mobility management message to said first data register,” as recited in amended claim 1.

In col. 12, lines 6-22, Forte discloses that “the WC module may be connected (directly, indirectly, co-located or remotely) with any other network switching device or communication system used to process calls.” But that disclosure does not suggest that the WC module (the

“second data register” in the Examiner’s rationale) would be configured to transmit the specific kind of message that is recited in claim 1, namely, *at least one mobility management message*.

Moreover, Forte makes clear that the WC module would not be configured transmit a message *to a first data register in the WWAN*, as recited in claim 1. Instead, Forte teaches that WC 30 interfaces with the PSTN, rather than with wireless networks, in order to make the system substantially technology independent:

It should be appreciated that the WC 30 is connected to a wireless carrier through a PSTN 54 and not by unique hardware or an in-office cellular network. As a result, WC 30 only has to interface with conventional components, such as the PBX 14 and PSTN 54. Thus, the system is substantially technology independent.

*See* col. 5, lines 26-31. Thus, in Forte’s approach, WC 30 communicates with PSTN 54, for example, by dialing a telephone number associated with wireless telephone 70 (*see* col. 6, lines 57-59), and PSTN 54, in turn, communicates with the wireless network (*see* col. 5, lines 10-17). Because WC 30 does not interface with wireless networks (such as a WWAN), it would not be configured to transmit a message to a data register in a WWAN, as recited in amended claim 1.

**b. Bridgelall does not teach at least one mobility management message that facilitates roaming between first and second wireless coverage areas by a multi-mode mobile station**

Claim 1 recites, *inter alia*, “whereby said at least one mobility management message facilitates roaming between said first and second wireless coverage areas by said multi-mode mobile station.” The Examiner has admitted that Karaoguz, Lu, and Forte fail to teach this element. *See* Office Action, p. 4. Instead, the Examiner has relied on Bridgelall for this element, specifically citing to Fig. 2 and col. 5, line 47 – col. 6, line 6. *See* Office Action, p. 4. In fact, however, Bridgelall does not make up for the admitted deficiency in Karaoguz, Lu, and Forte, as set forth below.

The Examiner has alleged that Home Location Register (HLR) 214 in Bridgelall corresponds to the claimed “first data register.” Bridgelall discloses that HLR 214, as well as VLR 216 and AC 218, “store information about the users so as to facilitate roaming, billing and network security.” *See* col. 5, lines 57-60. But Bridgelall does not explain *how* HLR 214 facilitates roaming. In contrast, claim 1 recites that “at least one mobility management message” facilitates roaming. Claim 1 further recites that the “at least one mobility management message” is transmitted from the “second data register” to the “first data register.” But the Examiner has not cited anything in Bridgelall that supposedly corresponds to “at least one mobility management message,” much less “at least one mobility management message” that is transmitted by a second data register. Indeed, the Examiner has not identified anything in Bridgelall that supposedly corresponds to the claimed “second data register.”

Therefore, the mere fact that Bridgelall discloses that HLR 214 (the “first data register” in the Examiner’s rationale) facilitates roaming is irrelevant, because Bridgelall does not disclose that HLR 214 facilitates roaming through the use of “at least one mobility management message,” as recited in claim 1. Thus, Bridgelall does not make up for the admitted deficiency in Karaoguz, Lu, and Forte.

Accordingly, Applicants submit that claim 1, as amended, is clearly allowable over Karaoguz, Lu, Forte, and Bridgelall for at least the foregoing reasons. Applicants further submit that claims 3, 4, 6-11, and 20 are allowable for at least the reason that they depend from an allowable claim.

3. **Conclusion**

Applicants submit that the present application is in condition for allowance, and notice to that effect is hereby requested. Should the Examiner feel that further dialog would advance the subject application to issuance, the Examiner is invited to telephone the undersigned at any time at (312) 913-0001.

Respectfully submitted,

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